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Remarks/Arguments

DEC 18 2006

Claims 1-16 of the present application have been rejected by the Examiner under 35 USC Section 102(e) as being anticipated by Borella et al, US Patent 6,816,912 (hereinafter "Borella). Applicants' respectfully traverse the Examiners conclusions for rejecting the present claims. Borella is a distinctly different invention that what applications' disclose and claim. Applicants describe the differences in the paragraphs below and have amended independent claims 1, 2 and 10 to more distinctly claim applicants' invention.

Borella's invention describes a method to optimize the initial call setup if both the mobile and application services are in the foreign network. It does so by describing the installation of a tunnel server in the foreign network and setting up a uni-directional IP-IP tunnel between the tunnel server and the foreign agent to reduce the traversal of the signals from the foreign application server to the mobile. Borella does not discuss how to optimize mid session mobility, i.e, how to optimize the data once the call is set up. Applicants' present invention provides an optimized mobility management solution by integrating three types of mobility management protocol, such as MMP, MIP-LR and SIP-based mobility management. Unlike Borella, none of these mobility protocols uses the combination of a home agent, foreign agent and any kind of IP-IP tunneling mechanism or tunnel server at any part of the network. In the present invention, based on the type of movement pattern of the client (intra-domain, inter-domain, inter-subnet) and the type of application running on the client (real time or non-real-time) the specific mobility protocol gets activated so as to provide an optimized solution for mid-session data. In addition, in applicants' present invention, applicants' do not suggest or teach the use of triangular routing even during the call setup. The Location Registrar for MIP-LR or SIP server helps to provide the current care-of-address of the mobile. Also location registers (LRs) in case of MIP-LR are not installed in the home network unlike the home agent in case of MIP as described by Borella.

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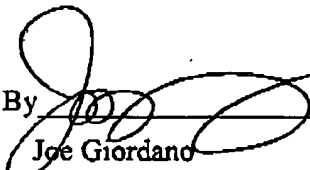
Applicant's invention tries to provide optimized solution for mid-session data for both real-time and non-real-time communication whereas Borella tries to optimize the round trip delay during the initial call establishment only. In the present invention, once the call is setup and the mobile is communicating with a correspondent node and then the mobile moves, session continuity is maintained at the end communicating hosts for MIP-LR for non-real-time application and by direct binding update (SIP Re-INVITE) using SIP-based mobility for real-time communication. Thus, the present invention avoids the need any IP-IP tunneling of the packets as described by Borella.

In order to best distinguish applicants invention from the cited art, applicants have amended claims 1, 2, and 10 to distinguish the present invention from Borella by more clearly claiming that the mobile host and method operate in the context of a solution for mid-session or connection mobility.

Favorable consideration and allowance of claims 1 through 16 are respectfully requested.

Respectfully submitted,

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